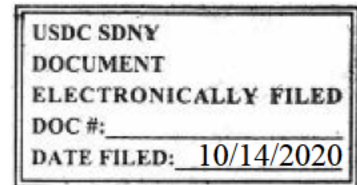


Roderick and Solange MacArthur Justice Center
160 East Grand Avenue, Sixth Floor
Chicago, Illinois 60611
O 312 503 0012
F 312 503 0891
C 203 214 0195
macarthurjustice.org

Jonathan Manes
Attorney at Law
Bar Admission: New York State

jonathan.manes@law.northwestern.edu

October 9, 2020



BY ECF

The Honorable Alison J. Nathan
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2102
New York, NY 10007

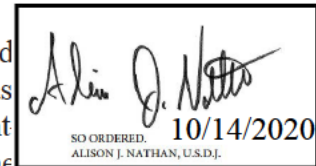
RE: *Innocence Project v. National Museum of Health and Medicine*, No. 19-cv-1574
Letter motion to file documents under seal

Dear Judge Nathan,

SO ORDERED.

Plaintiff submits this letter motion seeking leave file under seal portions of its Joint Status Report and accompanying Certificate of Service. Defendants consent to this motion.

The Joint Status Report provides the Court with newly-discovered upon Plaintiff's pending application to lift the Protective Order in this case particular document. *See* ECF Nos. 39, 42, 45, 51, 58, 62. That document its author and subject—remain within the non-disclosure obligation of the Order and are not currently public information.



In order to preserve the confidentiality of that information while the Court considers whether to lift the Protective Order, Plaintiff asks this Court's permission to redact from today's filings any mention of the author or subject's names, as well as related details that would allow a third-party readily to identify them or determine the specific contents of the document in question. This Court has previously approved sealing of other filings in this case for the same reason. *See* ECF Nos. 45, 51, 60.

The information sought to be redacted appears in Section III of the Joint Status Report and in the Certificate of Service, which attests that copies of today's filings are being sent by mail to the author and subject of the letter, who were both previously invited by this Court to be heard on Plaintiff's application for disclosure. *See* ECF No. 45. In accordance with this Court's rules, Plaintiff is filing under seal an unredacted copy of the Joint Status Report and Certificate of Service with proposed redactions highlighted for the Court's consideration. Plaintiff will simultaneously file on the public docket a redacted version of both filings. *See* ECF Rules and Instructions, Rule 6; Individual Practices, Rule 4(b).

Respectfully submitted,

/s/Jonathan Manes

Jonathan Manes

MacArthur Justice Center

160 E. Grand Ave., 6th Fl.

Chicago, IL 60611

(312) 503-0012

jonathan.manes@law.northwestern.edu

Counsel for Plaintiff

cc: All represented parties (via ECF); unrepresented non-party author and subject of the document (via U.S. mail)